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*PROPOSED COUNSEL FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA	§	Case No. 21-30085-hdh11
AND SEA GIRT LLC,	§	
	§	
Debtors <sup>1</sup> .	§	Jointly Administered

**WITNESS AND EXHIBIT LIST**

The Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 cases, by and through their undersigned proposed counsel, hereby designates the following witnesses and exhibits (the “Witness and Exhibit List”) for the hearing scheduled on March 4, 2021, at 1:30 p.m. (prevailing Central Time) (or as such hearing may be continued or rescheduled, the “Hearing”).

**WITNESSES**

1. Any witness listed or called by any other party.

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<sup>1</sup> The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

2. Any witness necessary to authenticate the exhibits designated herein.
3. Any witness necessary to rebut and/or impeach the testimony of a witness called or designated by any other party.

### **EXHIBITS**

<b>Ex. No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>
1.	Any pleadings or other documents filed in these cases or any related cases.			
2.	Any exhibits designated by any other party.			
3.	Rebuttal and impeachment documents as appropriate			

The Committee reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. The Committee further reserves the right to use additional exhibits not identified herein for purposes of rebuttal or impeachment. The Committee also reserves the right to rely upon and use as evidence: (i) exhibits included on the exhibit list of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned cases.

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Dated: March 1, 2021

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Laura L. Smith

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*Proposed Counsel to the Official Committee of  
Unsecured Creditors*

### **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service, on the 1st day of March, 2021.

/s/ Laura L. Smith

Laura L. Smith